



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 26, 2016

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

Re: United States v. Anthony Rodriguez,
16 Cr. 007 (AJN)

Dear Judge Nathan:

The Government writes, jointly with defense counsel, to respectfully request a two-week adjournment of the upcoming deadline for the filing of (1) an agreed upon 1-2 paragraph description of the case to be read to potential jurors during Voir Dire; (2) any Voir Dire requests; (3) any Requests to Charge; (4) any motions brought pursuant to Rule 404(b) of the Federal Rules of Evidence; and (5) any motions *in limine*, for the above-referenced matter. The current deadline for these submission is October 3, 2016. The parties continue to engage in discussions concerning a potential pretrial disposition of this matter. In part due to the recent travel schedules of counsel, these conversations have not yet been completed. As such, the parties propose that the above filings be due to the Court on October 17, 2016, with opposition papers, if any, filed by October 24, 2016, and replies, if any, filed by October 31, 2016.

Respectfully submitted,

PREET BHARARA
United States Attorney for the
Southern District of New York

By: J. A. Richman
Jason A. Richman
Assistant United States Attorney
(212) 637-2589

cc: Joshua Dratel, Esq. (by ECF)